



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

AUG 25 2011

Ref: 8EPR-N

Robert J. Thompson, District Ranger
Mystic Ranger District
Black Hills National Forest
8221 South Highway 16
Rapid City, SD 57702

RE: EPA Comments on Final Environmental Impact
Statement, Pactola Project, CEQ # 20110248

Dear Mr. Thompson:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the July 2011 Final Environmental Impact Statement (FEIS) for the Pactola Project. This FEIS was prepared by the Mystic Ranger District of the U.S. Department of Agriculture Forest Service (USFS) Black Hills National Forest to analyze the environmental impacts associated with proposed vegetation treatments to reduce the threat from the mountain pine beetle (MPB) epidemic and to minimize the potential for large-scale severe wildfires.

EPA provided scoping comments on the proposed project in a September 3, 2010 letter, and we provided additional comments on the Draft EIS (DEIS) with a June 13, 2011 letter. Three alternatives were analyzed in the DEIS, including action alternatives described as follows: Alternative B would include approximately 13,100 acres of mechanical vegetation treatments, 5,000 acres of prescribed burning, and 3 miles of new roads/27 miles of road reconstruction; and Alternative C would include 17,000 acres of mechanical vegetation treatments with the addition of cable and/or helicopter logging techniques, 5,000 acres of prescribed burning, and 19 miles of new roads/29 miles of road reconstruction. EPA's primary concerns with the DEIS were related to aquatic resources and air quality.

To address comments received on the DEIS, the FEIS includes the following: an expanded Watershed, Geology, and Soils section; an expanded Fire and Fuels/Air Quality section; an expanded Appendix B - Design Criteria, Mitigation Measures and Monitoring; and supplemental information in Appendix A - Public Involvement and Collaboration. Based on our review of the FEIS, EPA believes that its primary concerns with the DEIS have been addressed.

The FEIS notes the selection of Alternative C, with a minor modification, as the preferred alternative. Specifically, cable logging and its associated roads would not be allowed southwest of Pactola Lake due

to scenic concerns. With this area exclusion, we assume cable logging acres and miles of new and/or reconstructed roads would be reduced under this alternative. We recommend that the Record of Decision include updated Alternative C cable logging acreage and road construction/reconstruction mileage.

Aquatic Resources

EPA appreciates that additional language regarding baseline water quality conditions has been added to the FEIS Water Quality section. We also note the new discussion provided under the Stream Channel Stability section to clarify the types of stream surveys completed for this project.

The Appendix A response to comments section provides supplemental information related to water quality data, wetlands protection, MPB epidemic impacts on watersheds, and road closure mileage after project completion. Also, the FEIS includes expanded design criteria, mitigation measures and monitoring requirements, as follows: operational requirements adjacent to Pactola Reservoir; protection measures for range improvements and fences; effectiveness monitoring of road closures and re-vegetation efforts; and monitoring of hydrophobic soils following prescribed burns. Design criteria, mitigation measures and monitoring requirements should minimize aquatic resource impacts.

Air Quality

We appreciate that the FEIS includes an expanded Fire and Fuels/Air Quality section. This section provides a qualitative discussion of existing air quality conditions near the project area. For future projects, we recommend including air quality trends at nearby Class I areas to ensure that the decision-maker understands baseline conditions when weighing potential impacts from project activities.

The FEIS now contains a qualitative discussion of emissions related to prescribed fire and additional information and/or requirements related to fire and smoke management, including use of the Interagency Prescribed Fire Planning and Implementation Procedures Guide in developing any Burn Plans, as well as avenues for public notification of prescribed burns. This process should result in appropriate smoke mitigation, modeling, and monitoring techniques to ensure adequate protection of the National Ambient Air Quality Standards and nearby Class I area visibility. For future projects, we recommend including an emissions inventory of predicted air emissions from all project activities.

We appreciate the opportunity to review this FEIS. If we may provide further explanation of our comments, please contact me at 303-312-6925, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,



Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation